

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

CURTIS M. COLLINS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. No. 05-739-SLR
	)	
WARDEN RICK KEARNEY, et al.,	)	
	)	
Defendants.	)	

**CERTIFICATION**

At Wilmington this 9<sup>th</sup> day of November, 2006;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on November 2, 2006, do here by certify that:

1. The deposition of James Chandler was held on November 2, 2006, at 1:30 p.m., at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, James Chandler declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, Curtis M. Collins, for deponent, James Chandler.

4. I personally observed deponent, James Chandler, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and

written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties and the deponents.

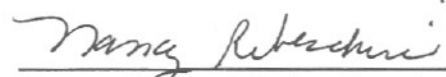
I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of November, 2006.

  
\_\_\_\_\_  
Nancy Rebeschini, Esquire,  
Designated Officer

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2006, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Erika Yvonne Tross, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiff, Curtis M. Collins, SBI #314128, Delaware Correctional Center, SHU 17-DL-2, 1181 Paddock Road, Smyrna, DE 19977.

  
Nancy Rebeschini, Esquire,  
Designated Officer

Sgt

Sgt. CHANDLER

① THE PLAINTIFF, SEEN YOU WHILE HE WAS  
# Laying on the ground, AND I NOTICED  
THAT YOU WAS STANDING THERE LAUGHING YOU  
HEAD 'OFF AT THE SITUATION INSTEAD OF  
STOPPING UNFAIR TREATMENT TOWARDS A  
INMATE WHY THEN DIDN'T YOU "SGT" PUT A  
STOP TO WAS HAPPENING?

Sgt.  
# ② HAVE YOU EVER SEEN OR HEARD A FELLOW  
OFFICERS RASH OUT AT A INMATE BECAUSE  
OF FAMILY PROBLEMS?

Sgt.  
# ③ IS IT TRUE WHEN PLAINTIFF COLLINS  
CAME TO YOU ABOUT A UNPROFESSIONAL  
OFFICER'S BERZANSKY BEING OUT OF  
CONTROL?

Sgt.  
# ④ IS IT TRUE THAT OFFICER BERZANSKY  
RAN TOWARDS THE PLAINTIFF IN THE  
"CHOWHALL" AND ASSAULTED THE PLAINTIFF  
BY PUNCHING THE PLAINTIFF IN THE FACE  
FOR NO REASON AT ALL?

Sgt.

Sgt. CHANDLER

#5

IS IT THE TRUTH "WHEN AN INMATE "GET SERIOUSLY" HURT, THEY MUST IMMEDIATELY BE TAKEN TO MEDICAL IN ANY EMERGENCY SITUATION?"

#6

WHY THEN DIDNT YOU SEE THAT THE PLAINTIFF GOT PROPPER MEDICAL TREATMENT?

#7

Sgt IS IT TRUE YOU HAVE A PERSONAL VENDETTA AGAINST THE PLAINTIFF? OR YOU JUST DONT CARE ABOUT THE WELL BEING OF INMATES?

#8

Sgt

ALSO IS THE TRUTH THAT "S.C.I. IS A REAL "RECAH" PRISON?"

#9

OK" FOR THE RECORD WITH ALL THESE SERIOUS QUESTION THAT WAS ASKED HERE TODAY WOULD YOU BE WILLIN TO TAKE A BIG LIE DETECTOR TEST!

#10

IS IT TRUE THAT ANY OFFICER WITH A HIGH RANK IS TO TAKE CHARGE WITHOUT ANY OFFICER WITHOUT NO RANK YOU WERE THE ONLY HIGH RANK IN THE CHOWHALL WHY YOU, DIDNT YOU TAKE CHARGE OF THE SITUATION!

- ① It was impossible for the inmate to see me due to the fact that he was face down. Also Capston had been used on him and this greatly impairs the vision. As to the question whether or not I was laughing is untrue & incorrect. By the time I got to the back of the chow hall the Fm (Curtis Collins) had already been sprayed and handcuffed at that time.
- ② I don't discuss officers family problems with them so I would not know.
- ③ NO
- ④ Inmate Collins was removed from his chow hall due to his trying to incite others to a riot. Fm Collins was given a direct order by myself to exit the chow hall which he failed to do.
- ⑤ Yes
- ⑥ Fm was taken to medical by the officer in volved, cleared and placed in a holding cell.
- ⑦ NO

⑨ NO

⑩ Because with three other officers involved in the situation, I was the only one left to watch the other 30 or so high security in mates that were still in the chowhall at that time.

11-2-06

  
James R. Chandler

Deposition of Sgt. Chandler

11/2/06

1. No objection
2. Objection - irrelevant
3. Objection - unintelligible
4. Objection - compound question
5. No objection
6. Objection to form
7. Objection compound
8. Objection unintelligible
9. Objection
10. Objection unintelligible

Erica Y. Jones #4506  
Date: 11/2/06